

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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|  |   |                         |
|--|---|-------------------------|
| In re  | ) | )                       |
|  |   | Case No. 25-90022 (ARP) |
| <i>Telefónica del Perú S.A.A.</i> <sup>1</sup> | ) | )                       |
|  | ) | )                       |
| Debtor in a Foreign Proceeding.                | ) | Chapter 15              |
|  | ) |                         |

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**STATEMENT NOTIFYING THE COURT OF DEVELOPMENTS IN THE PERUVIAN  
RESTRUCTURING PROCEEDING PURSUANT TO 11 U.S.C. § 1518**

1. Timothy O'Connor (the “**Petitioner**” or the “**Foreign Representative**”), the duly-authorized foreign representative of *Telefónica del Perú S.A.A.* (“**Telefónica Perú**” or the “**Chapter 15 Debtor**”) in its voluntary ordinary restructuring proceeding (the “**PCO**” or “**Peruvian Restructuring Proceeding**”) commenced before the National Institute for the Defense of Competition and Protection of Intellectual Property (*Instituto Nacional de Defensa de la Competencia y de la Protección de la Propiedad Intelectual*) (“**INDECOPI**”) by the filing of a petition (the “**PCO Petition**”) on February 24, 2025 pursuant to Article 24 the General Insolvency Law (*Ley General del Sistema Concursal*) (Law No. 27809) (the “**Peruvian Insolvency Law**”), of the laws of the Republic of Peru, respectfully submits this statement pursuant to section 1518 of title 11 of the United States Code to provide the United States Bankruptcy Court for the Southern District of Texas (this “**Court**”) with a status update on the Peruvian Restructuring Proceeding.

2. On February 25, 2025, the Foreign Representative commenced the above-captioned case under chapter 15 of Bankruptcy Code and filed with this Court, among other things, the

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<sup>1</sup> The debtor in this chapter 15 case (the “**Chapter 15 Case**”) and the last four digits of the tax number in the jurisdiction in which it pays taxes is *Telefónica del Perú S.A.A.* (7491-Peru).

*Petitioner's Declaration and Verified Petition for Recognition of the Peruvian Proceeding and Motion for Order Granting Related Relief Pursuant to 11 U.S.C. §§ 105, 1509, 1515, 1517, 1520 and 1521 [ECF No. 2].*

3. Since the commencement of this Chapter 15 Case, Telefónica Perú continues to make progress in the Peruvian Restructuring Proceeding in accordance with the Peruvian Insolvency Law. As an initial matter, INDECOPA has now assigned the following case number to the PCO: 00026-2025/CCO-INDECOPA. In addition, INDECOPA has been working diligently with Telefónica Perú to evaluate the PCO Petition. On March 17, 2025, INDECOPA issued Telefónica Perú an information request (the “**Information Request**”). Telefónica Perú is working on gathering the requested information and will respond to INDECOPA as soon as possible. Telefónica Perú, represented by its Peruvian counsel, Rebaza, Alcázar & De Las Casas Abogados, has engaged in meetings with representatives of INDECOPA to discuss the status of INDECOPA’s review of the PCO Petition and the Information Request.

4. The Foreign Representative will keep this Court apprised of further developments with respect to the Peruvian Restructuring Proceeding.

Dated: March 20, 2025  
Houston, Texas

*/s/ Charles R. Koster*

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and Foreign Representative*

**Certificate of Service**

I certify that on March 20, 2025, I caused a copy of the foregoing document to be served via electronic mail, U.S. mail, or first-class postage, as applicable, and by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Charles R. Koster*

Charles R. Koster